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UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re:)	Case No. 15-31810-rld11 (Lead Case)
)	
UNION LUMBER COMPANY, INC.)	THE FOLLOWING CASE IS JOINTLY
)	ADMINISTERED WITH 15-31811-rld
Debtor.)	
)	
MACE A. CADWELL)	Case No. 15-31811-rld11
SHERRY A. CADWELL)	
)	MOTION FOR ORDER REOPENING
Debtors)	CLOSED CASE; EXPEDITING HEARING
)	IF REQUESTED/REQUIRED and WAIVING
)	FILING FEE

COMES NOW Union Lumber Company, Inc, and Mace and Sherry Cadwell, the debtors in these jointly administrated cases, and, pursuant to BR 5010, move the Court to reopen these Chapter 11 cases which were dismissed on June 4, 2015. In support of this motion Debtor attaches:

1. A statement explaining why the case needs to be opened; and
2. A statement as to why the required filing fee should be withheld at this time.
3. Copy of loan commitment letter in the amount of \$3,000,000 from McCoy Capital Management;

1 DATED this 15th day of July, 2015.

2 RENE ERM II, P.L.L.C.

3 */s/ Rene Erm II*

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Rene Erm II, OSB 961454
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:)	
)	Case No. 15-31810-rld11 (Lead Case)
UNION LUMBER COMPANY, INC.)	
)	THE FOLLOWING CASE IS
Debtor.)	JOINTLY ADMINISTERED WITH
)	15-31811-rld11
)	
MACE A. CADWELL)	CASE NO. 15-031811-rld11
SHERRY A. CADWELL)	
)	DECLARATION OF MACE
Debtors.)	CADWELL
)	
STATE OF OREGON)	
) ss.	
County of Union)	

I, MACE CADWELL, being duly sworn and under penalty of perjury under the laws of the state of Oregon, state as follows:

I am the shareholder/owner of Union Lumber Company and the associated companies. The jointly administered bankruptcy proceedings described above were dismissed on June 4, 2015 following hearing with this Court. At the hearing it was clear that the accounting practices in place at the time did not allow for the production of necessary records and documentation as requested. It was also noted that the plan would be a refinancing plan.

For a number of reasons, the Court dismissed the proceedings but the Court also stated that the debtors could move the Court to reopen the bankruptcy in the event that they obtain documentation detailing their ability to refinance – a “unconditional commitment letter.”

Attached is an unconditional letter of commitment in the amount of \$3,000,000.00. This amount will pay the arrearage current in the Banner Bank loan (which is not being refinanced), pay the property tax arrearage and provide a sum of cash to Community Bank that is in excess of the reasonable value of their collateral property.

Currently none of the businesses are operating. Following dismissal of the bankruptcy, the Union County Circuit Court issues injunctions that resulted in a complete shutdown of the business with a hearing scheduled for Tuesday, July 21. If a hearing is necessary I request that the hearing be expedited to be held prior to July 21, 2015.

DATED this 15th day of July, 2015.

/s/ Mace Cadwell

Mace Cadwell

McCoy Capital Management

07/14/2015

Mace Cadwell

Union Lumber Co. Inc.

10514 N. McAlister Rd

LaGrande, OR 97850

Mace Cadwell,

This letter is to confirm that you have a loan commitment in the amount of \$3,000,000.00 (Three Million Dollars).

This loan is to be secured by the following assets:

- Island City Property
- Equipment
- Inventory
- Accounts Receivable
- Airplane & Misc.
- Baker City Property
- Union Property

The loan is subject to the following:

1. Signed Loan Docs
2. Executed Security Interest to include: Note & Trust Deed, UCC Filing, and Chattel Mortgage

There are no other contingencies to this letter of commitment.

Once these documents have been signed, recorded, and approved, we will proceed to fund.

If you have any additional questions, please give me a call.



Frank Broeg, Director

McCoy Capital Management

387 W. Jefferson Ave. Sisters, OR 97759

541-480-5693

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:)	
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UNION LUMBER COMPANY, INC.)	
)	THE FOLLOWING CASE IS
Debtor.)	JOINTLY ADMINISTERED WITH
)	15-31811-rld11
)	
MACE A. CADWELL)	CASE NO. 15-031811-rld11
SHERRY A. CADWELL)	
)	DECLARATION OF STEVE KASPER
Debtors.)	
)	
STATE OF OREGON)	
) ss.	
County of Union)	

I, STEVE KASPER, being duly sworn and under penalty of perjury under the laws of the state of Oregon, state as follows:

I am the Chief Financial Officer of Union Lumber Company and the associated companies. The jointly administered bankruptcy proceedings described above were dismissed on June 4, 2015 following hearing with this Court. Soon thereafter, creditor Community Bank obtained state court injunctions which essentially froze all assets. None of the businesses are in operation at this time and all financial accounts are frozen. As a result, there are no monies to pay the filing fee to reopen at this time. I ask the Court to waive the filing fee at this time with the understanding that it will be paid at such time when there is money available to do so.

DATED this 15th day of July, 2015.

/s/ Steve Kasper

Steve Kasper